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   PACIFIC BELL TELEPHONE COMPANY
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9   UNITED STATES DISTRICT COURT

10   EASTERN DISTRICT OF CALIFORNIA

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12 CALIFORNIA SPORTFISHING   CASE NO. 2:21-cv-00073-MCE-JDP
    PROTECTION ALLIANCE,
13   **STIPULATION RE EXTENSION OF**
                                     DEADLINES UNDER CONSENT
14   Plaintiff,   **DECREE; [PROPOSED] ORDER**

15   v.   Judge: Hon. Jeremy D. Peterson
                                     Courtroom: 9
16 PACIFIC BELL TELEPHONE COMPANY,

17   Defendant.

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                        STIPULATION

1   Having met and conferred, the undersigned parties stipulate as follows:

2   WHEREAS, on November 5, 2021, the Court entered the Amended Consent Decree

3   (Consent Decree) (ECF No. 22) in this action;

4   WHEREAS, the Consent Decree calls for the removal and disposal of certain submerged

5   cables (Cables) in Lake Tahoe and such activities require approvals from certain public agencies

6   (Approvals);

7   WHEREAS, the Consent Decree provided Defendant with an initial six months to secure

8   the Approvals and allowed the parties to mutually agree to extend that deadline by up to six months;

9   WHEREAS, Defendant has submitted applications for Approvals to relevant public

10   agencies and is now waiting for the agency review process to conclude;

11   WHEREAS, the current deadline under the Consent Decree for Defendant to provide notice

12   that it has secured the Approvals is October 26, 2022;

13   WHEREAS, due to the uncertainty surrounding as to when public agencies may issue the

14   Approvals, the Consent Decree also allows the Court to extend the deadline to secure the

15   Approvals;

16   WHEREAS, under the circumstances, the parties agree to extend the deadline to secure the

17   Approvals by approximately 90 days to January 27, 2023;

18   WHEREAS, the parties understand that all Approvals may not issue before January 27,

19   2023, and counsel for Defendant has agreed to provide prompt notice to Plaintiff's counsel after it

20   learns of any material information regarding the pending permitting applications and agency review

21   process; and

22   WHEREAS, the parties will provide a joint update prior to January 27, 2023, regarding the

23   status of issuance of the Approvals and request a further extension as needed.

24   NOW, THEREFORE, the parties respectfully and jointly ask that the Court enter an order

25   extending the deadline for securing the Approvals and providing notice of the same to January 27,

26   2023. A proposed order follows the parties' signature blocks.

27   Respectfully submitted,

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STIPULATION

1   DATED: October 19, 2022   PAUL HASTINGS LLP

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                                                       By: _____ /s/ *Navi S. Dhillon* _____
4   NAVI S. DHILLON

5   Attorneys for Defendant
                                                       PACIFIC BELL TELEPHONE COMPANY
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8   DATED: October 19, 2022   KLAMATH ENVIRONMENTAL LAW
                                                       CENTER
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                                                       By: _____ /s/ William Verick _____
11   WILLIAM VERICK

12   Attorneys for Plaintiff
                                                       CALIFORNIA SPORTFISHING
13   PROTECTION ALLIANCE

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15   The filer of this document attests that all signatories listed above have concurred in the filing

16   of this document.

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STIPULATION

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[PROPOSED] ORDER

2   PURSUANT TO STIPULATION, the deadline under the Amended Consent Decree (ECF

3 No. 22) for Defendant to provide Plaintiff with notice that it has secured the Approvals is extended

4 to January 27, 2023.

5   The parties shall submit a joint status report regarding the status of the Approvals by no

6 later than January 15, 2023.

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IT IS SO ORDERED.

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Dated: November 1, 2022   _____

10   JEREMY D. PETERSON
                                  UNITED STATES MAGISTRATE JUDGE

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